

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Rural Digital Opportunity Fund)	WC Docket No. 19-126
)	
Connect America Fund)	WC Docket No. 10-90

**COMMENTS OF THE STATE OF MAINE CONNECTME AUTHORITY AND THE
MAINE BROADBAND COALITION**

The State of Maine ConnectME Authority (“ConnectME”) and The Maine Broadband Coalition (“MBC”) hereby submits these comments in response to the Federal Communications Commission’s (“Commission” or “FCC”) *Notice of Proposed Rulemaking* to establish the Rural Digital Opportunity Fund (“RDOF”).¹

I. INTRODUCTION AND SUMMARY.

ConnectME is a public instrumentality of the Maine state government whose mission is to facilitate the universal availability of broadband to all Maine households and businesses and help them understand the valuable role it can play in enriching their lives and helping their communities thrive.² The Maine Broadband Coalition is a network of public policy professionals, educational institutions, and businesses, including Internet Service Providers (“ISPs”), non-profit organizations and individuals who care deeply about Maine’s economic future and see broadband as a key factor in sustainable economic growth.³ The primary focus of

¹*In re Rural Digital Opportunity Fund and Connect America Fund*, WC Dockets No. 19-126 & 10-90, Notice of Proposed Rulemaking, FCC 19-77 (rel. Aug. 2, 2019) (“NPRM”).

²<https://www.maine.gov/connectme/home>

³<https://www.mainebroadbandcoalition.org/>

both ConnectME and MBC is extending reliable, high-speed broadband to unserved areas of Maine.

ConnectME and MBC strongly support the FCC's RDOF effort and believe it has the potential to extend broadband to many if not most unserved areas of Maine, if two key details are addressed: there must be mechanisms for (1) funding unserved portions of census blocks that are partially served and (2) using the more granular and accurate data the State of Maine to determine which addresses are unserved. ConnectME and the members of MBC have performed a detailed analysis of the effect that the proposed rules would have on Maine; the analysis shows that at least 21,000 rural Maine unserved homes or businesses would not be eligible for RDOF support.

II. Maine Form 477 Analysis

One of our member companies, NBT Solutions, is a Geographic Information Systems company headquartered in Portland, ME, with a particular expertise in mapping applications for the telecommunications industry. NBT Solutions ("NBT") is the developer of the popular Vetro Map fiber mapping solution used by many ISPs for designing, constructing, and operating fiber networks.⁴ NBT has Form 477 data as a mapping layer and some ISPs have used Vetro Fiber Map to develop applications for Federal funding for rural networks including USDA and FCC programs such as CAF II. NBT has helped the State of Maine develop its detailed, granular maps of broadband availability.

NBT performed an analysis using three data sources:

1. Census Blocks with the most recent FCC 477 reported Max Advertised download speeds at or above 25Mbps (excludes satellite),

⁴<https://www.vetrofibermap.com/>

2. Maine ng911 Address Points: statewide data used as reference for totals and to isolate the unserved addresses,
3. Address points falling on road segments with address ranges reported to be UNSERVED at 25/3Mbps or better.

NBT took the count of address points in data set #3 that fall in census blocks in data set #1 above. These would be locations/addresses deemed ineligible for broadband grants where any grant funding is excluded from Census Blocks shown as 'SERVED' by 477.⁵ By this analysis, a significant portion of Maine residents and businesses which are underserved by the FCC's 25/3Mbps definition would **not** be eligible for RDOF support. A map to illustrate this situation is attached as Appendix A.

III. ConnectME Database Analysis

Since 2009 the State of Maine's ConnectME Authority has been maintaining a database of the broadband service levels available to Maine households and businesses. Initially the database was based on FCC Form 477 data. However, that data has been augmented in three ways:

1. The data is now available on an address basis rather than on a Census Block basis;
2. The vast majority of Maine ISPs have augmented for the State of Maine Form 477 data giving speed data on an address basis and based provision-able speeds rather than advertised speeds.

⁵ConnectME develops its maps primarily from data reported by providers, but does allow individuals to enter data for their locations ("crowdsourcing"). This analysis **only** used data provided by providers. It did **not** include 'Crowdsourced' locations that were reported to ConnectME by individuals. If the "crowdsourced" data had been used, there would be more addresses in the "unserved" category. However, as this data is ad hoc we used the Sewall Analysis source only (James W Sewall Company is the consultancy that originally developed ConnectME's maps).

3. It is possible for individual households and businesses to update the speed at their location (“crowd-sourcing”).

The biggest impact on the database are the granularity and the additional provider data; crowd-sourcing has had a relatively limited impact. We note that the ConnectME database has many of the qualities that the FCC is seeking in its Digital Data Opportunity Collection/Modernizing the FCC Form 477 proceeding.

Based on an analysis of the ConnectME database, approximately 83,144 households in Maine do not have access to 25/3Mbps or higher. This number is significantly larger than is shown by the current Census Block based Form 477 data. Therefore, it is reasonable to expect the number of households which are unserved and not eligible for RDOF support is significantly higher than the earlier Form 477 analysis would expect.

The methodology used to assemble the ConnectME database is attached as Appendix B. A breakdown by town of households shown as unserved by the ConnectME database is attached as Appendix C.

IV. Proposed Remedy

To address the problems outlined, we propose that until the FCC’s new polygon-based mapping is available:

1. The RDOF support the extension of broadband to the unserved portions of partially-served Census Blocks.
2. Where it is available, is more granular, and more accurate than Form 477 data, state level data be used to determine what addresses are unserved.

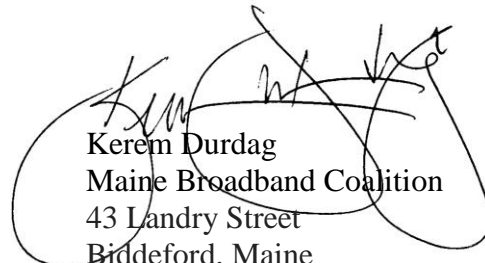
V. CONCLUSION

For the reasons stated herein, ConnectME and the Maine Broadband Coalition urges the Commission to consider the recommendations in its comments, as it further examines the issues raised in the Notice of Proposed Rulemaking.

Respectfully submitted,



Peggy Schaffer
Executive Director, ConnectME
59 State House Station
Augusta, Maine
207-624-9807



Kerem Durdag
Maine Broadband Coalition
43 Landry Street
Biddeford, Maine
207-602-1207

September 20, 2019